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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 **IN RE GOOGLE PLAY STORE**
6 **ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

7 THIS DOCUMENT RELATES TO:

**JOINT STATEMENT RE: CASE
SCHEDULE**

8 *Epic Games Inc. v. Google LLC et al.*, Case
9 No. 3:20-cv-05671-JD

Judge: Hon. James Donato

10 *In re Google Play Consumer Antitrust*
11 *Litigation*, Case No. 3:20-cv-05761-JD

12 *In re Google Play Developer Antitrust*
13 *Litigation*, Case No. 3:20-cv-05792-JD

14 *State of Utah et al. v. Google LLC et al.*, Case
15 No. 3:21-cv-05227-JD

Pursuant to this Court's Order dated September 9, 2021 (*In re Google Play Store Antitrust Litigation*, No. 3:21-md-02981-JD (N.D. Cal. 2021) ("MDL") ECF No. 103), the parties in the above-captioned MDL action ("the Parties"), by and through their undersigned counsel, submit this Joint Statement regarding the Parties' proposed case schedule. As directed by the Court, the Parties' negotiations were guided by the schedule in the *Capacitors Antitrust Litigation* and also the trial date of September 6, 2022.

ACTIVITY	DATE
Google's Responsive Pleadings	October 11, 2021
Class Cert Motion with Plaintiffs' expert reports	January 28, 2022
Class Cert Opposition with expert report; <i>Daubert</i> Motion (if any) ¹	February 25, 2022
Class Cert Reply with reply expert report (if any) ² ; <i>Daubert</i> Opposition (if any)	March 21, 2022
Class Cert <i>Daubert</i> Reply (if any)	March 28, 2022
Deadline for completion of fact discovery	April 4, 2022
Plaintiffs' Merits Expert Reports	April 11, 2022 ³

¹ Class Plaintiffs have the right to file a *Daubert* motions after receiving Google's class certification expert report. Google and Class Plaintiffs will confer regarding an appropriate schedule for briefing such a motion in advance of the class certification hearing should any Class Plaintiffs elect to file such a motion(s).

² Google reserves all objections regarding any class certification reply report. If Class Plaintiffs file such a reply report, and Google determines it needs to seek relief to address it, Google shall file any such request by March 28, 2022, and any response thereto by a Class Plaintiff shall be filed by April 4, 2022.

³ Plaintiff States agree to the date of April 11, 2022, for service of their merits expert reports on condition that they receive all previously produced MDL Google documents and Google transactional data by October 15, 2021, and reserve all rights to request a separate expert schedule in the event that Google has not produced those documents and data by October 15. Google and the Plaintiff States are currently working together to reach agreement on a modified protective order and expect to do so prior to October 15. Google reserves all rights to oppose Plaintiff States' request to modify the schedule, including in the event that a protective order is not in place sufficiently in advance of October 15 or the States have not otherwise agreed to maintain the confidentiality of any reproduction of previously produced documents or data pending entry of a protective order.

Class Certification Hearing and Expert Hot Tub	April 14, 2022
Google's Merits Expert Reports	May 9, 2022
Plaintiffs' Merits Reply Expert Reports	June 6, 2022
Expert Discovery Cut Off	June 24, 2022
Dispositive Motions/ <i>Daubert</i>	June 30, 2022
Dispositive Motions/ <i>Daubert</i> Oppositions	July 22, 2022
Dispositive Motions/ <i>Daubert</i> Replies	August 4, 2022
Dispositive Motion Hearing and Expert Hot Tub	August 11, 2022
Pretrial Conference	August 18, 2022
Trial	September 6, 2022

Respectfully submitted,

Dated: September 23, 2021

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By: /s/ Yonatan Even

Yonatan Even

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Dated: September 23, 2021

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By: /s/ Karma M. Giulianelli

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1 Dated: September 23, 2021

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4 By: /s/ Elizabeth C. Pritzker
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19 *Pure Sweat Basketball*

1 Dated: September 23, 2021

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11 Dated: September 23, 2021

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14 Respectfully submitted,

15 By: /s/ Brendan Glackin
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17 *Counsel for Utah and the Plaintiff States*

18 Dated: September 23, 2021

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26 *Counsel for Defendants Google LLC et al.*

1 Dated: September 23, 2021

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8 *Counsel for Defendants Google LLC et al.*

E-FILING ATTESTATION

I, Brian C. Rocca, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Brian C. Rocca

Brian C. Rocca